

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ADVANCE LOCAL MEDIA LLC, ADVANCE
MAGAZINE PUBLISHERS INC. D/B/A
CONDE NAST, THE ATLANTIC MONTHLY
GROUP LLC, FORBES MEDIA LLC,
GUARDIAN NEWS & MEDIA LIMITED,
INSIDER, INC., LOS ANGELES TIMES
COMMUNICATIONS LLC, THE
MCCLATCHY COMPANY, LLC, NEWSDAY,
LLC, PLAIN DEALER PUBLISHING CO.,
POLITICO LLC, THE REPUBLICAN
COMPANY, TORONTO STAR
NEWSPAPERS LIMITED, AND VOX MEDIA,
LLC,

Plaintiffs,

v.

COHERE INC.,

Defendant.

Civil Action No. 1:25-cv-01305-CM

**DECLARATION OF R. DAVID HOSP IN SUPPORT OF DEFENDANT
COHERE INC.'S NOTICE OF PARTIAL MOTION TO DISMISS THE COMPLAINT**

I, R. David Hosp, declare as follows:

1. I am a partner at Orrick, Herrington & Sutcliffe LLP, counsel for Defendant Cohere Inc. I submit this declaration in support of Cohere Inc.'s Motion to Dismiss.
2. Attached hereto as Exhibit A is a true and correct copy of the Order Granting Motion to Dismiss with Leave to Amend, ECF No. 322, in *Concord Music Group, Inc. v. Anthropic PBC*, No. 5:24-cv-3811 (N.D. Cal. Mar. 26, 2025).
3. Attached hereto as Exhibit B is a true and correct copy of Julia Silverman, *Portland Public Schools Quietly Adopts Rule Barring Teachers From 'Political or Personal' Classroom Displays*, The Oregonian/OregonLive (Sept. 16, 2024), an article that is cited in the Complaint.
4. Attached hereto as Exhibit C is a true and correct copy of *Ticketmaster Pauses Transfer of Taylor Swift's Eras Tickets Amid Reports of Hacks and Theft*, The Toronto Star (Oct. 6, 2024), an article that is cited in the Complaint.
5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 22, 2025

Respectfully Submitted,

/s/ R. David Hosp

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